47. A system for anchored conversations, comprising:

means for initiating and maintaining conversation clients at each of a requesting host and a recipient host, including,

means for receiving an anchored conversation request from an application at a requestor host, said application having an artifact with an anchor identifying a location of an anchored conversation;

means for initiating a requestor conversation client associated with the application at a requestor host;

means for anchoring said requestor conversation client, comprising a means for maintaining a position of said requestor conversation client relative to said anchor of said artifact of said application at said requestor host;

means for requesting startup of a recipient conversation client;

means for starting said application at a recipient host;

means for retrieving a copy of said artifact into said application at said recipient host; and

means for anchoring said recipient conversation client, comprising a means for maintaining a position of said recipient conversation client relative to said anchor of said artifact of said application at said recipient host.

Remarks

The above Amendments and these Remarks are in reply to the Office Action mailed September 6, 2002. No fee is due for the addition of any new claims. A Petition for Extension of Time to Respond is submitted herewith, together with the appropriate fee.

Claims 1-47 were pending in the Application prior to the outstanding Office Action. In the Office Action, the Examiner rejected claims 1-47. The present Response amends Claims 1,

3, 4, and 28, leaving for the Examiner's present consideration Claims 1-47. Reconsideration of the rejections is requested.

I. Summary of Examiner's Rejections

Claims 1-47 were rejected under 35 U.S.C. §102(e) as being anticipated by *England* (U.S. Patent No. 6,144,991).

II. Summary of Applicants' Response

Claims 1, 3, 4, and 28 have been amended.

III. Response to Rejections Under 35 U.S.C. §102(e)

Claims 1-47 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,144,991 ("*England*"). Independent Claim 1, as amended, calls for, among other limitations, "a conversation client configured to access said anchored conversation and to receive communications regarding a portion of the artifact; [and] an anchor configured to identify a location within said artifact with which said conversation client is associated." Claim 28 claims an "anchored conversation support device, comprising: a placement mechanism configured to place an anchor at a selected position within an artifact of an application..." Claim 33 includes, among other limitations, "an anchor mechanism configured to identify and attach a conversation client to a selected anchor position in an artifact." Claim 36 calls for, among other limitations, "receiving a conversation request from a conversation client anchored in a master artifact." Claim 42 includes, among other limitations, "placing an anchor in an artifact of an application." Finally, Claim 47 includes among many other limitations, "said application having an artifact with an anchor identifying a location of an anchored conversation."

Thus, generally speaking, each of the independent claims include limitations of (1) an artifact; and (2) anchoring a conversation client within the artifact.

A. *England*

England describes a system and method for managing interactions between users in a browser-based telecommunications network. *See, England*, Title. As acknowledged by the Examiner, *England* utilizes a graphical user interface (e.g. Internet Explorer) with frame sets, such as those depicted in Figures 1-5 to allow a "guide" to communicate in real time with a "client" by displaying information to the client through frames of a frame set. *See,* Office Action, p. 3. Within each frame, a guide may load different collaborative tools to communicate with a client. *See, England*, col. 10, lines 50-53. The guide and the client may then use whatever tools the guide has loaded into the frames to communicate.

However, there is no discussion in *England* of anchoring a conversation client within an artifact, as called for in each of the independent claims. Indeed, there is no discussion of an artifact for which a conversation client may be anchored. The frame layouts described in *England* are arrangement designs that specify locations at which collaborative tools may be loaded and then used to communicate with a client. The client and guide do not communicate with one another to discuss the frame layouts.

In contrast, Claim 1 specifically includes, among other limitations, "a conversation client configured to . . . receive communications regarding a portion of the artifact." Claim 28 includes the limitation of "a placement mechanism configured to place an anchor at a selected position within an artifact. . ." Claim 33 includes "an anchor mechanism configured to identify and attach a conversation client to a selected anchor position of an artifact." Claim 36 includes "a conversation client anchored in a master artifact." Claim 42 includes "placing an anchor in an

artifact of an application." And Claim 47 includes "said application having an artifact with an anchor identifying a location of an anchored conversation."

Thus, an artifact as described in the present application is an object that users wish to communicate about and not merely a frame layout used to organize communication tools. For example, an artifact may be "Word files, PowerPoint files, spreadsheet files, graphical simulations, etc." *Application*, p. 12, lines 11-13. Anchoring a conversation client within an artifact provides the ability for users to communicate and interact with one another and discuss a particular portion of the artifact itself without having separation of the conversation client and the artifact itself.

Moreover, there is also no discussion in *England* of "an anchor" as described and claimed in the present application. The Examiner has not identified where in *England* anchors as called for the in the claims is described. If the Examiner still believes that *England* discloses anchors as called for in the present application, Applicants request that the Examiner point out with particularity where such limitation is taught.

Thus, *England* does not disclose the inventions and/or limitations recited in any of the independent claims. In addition to the discussion above, Applicants submit that there are several other limitations in each of Claims 1-47 that are not discussed within *England*. Applicants reserve the right to argue those limitations should it become necessary in the future.

Because *England* does not teach each of the limitations of independent Claims 1, 28, 33, 36, 42, and 47, *England* cannot render Claims 1, 28, 33, 36, 42, and 47 unpatentable under 35 U.S.C. §102(e). Additionally, because Claims 2-27, 29-32, 34-35, and 45-46 each ultimately depend from those independent claims, *England* also cannot render those claims unpatentable under 35 U.S.C. §102(e) for at least the same reasons as discussed above.

Accordingly, Claims 1-47 are believed patentable under 35 U.S.C. §102(e) over *England* and withdrawal of the Examiner's rejection of Claims 1-47 based on 35 U.S.C. §102(e) is requested.

B. Claims 28 and 33-47

As discussed above, Claims 28 and 33-47 are believed patentable over *England.* This section specifically addresses the Examiner's comments regarding those claims.

In the Office Action the Examiner states that "Claim 28 does not teach or define any new limitations above claims 1-27 and therefore is rejected for similar reasons" and that "Claims 33-47 do not teach or define any new limitations above claims 1-32 and therefore are rejected for similar reasons." *Office Action*, p. 7, 8.

However, Claims 1-27 are directed toward "[a] system for placing and maintaining anchored conversations within an artifact," whereas Claim 28 claims "[a]n anchored conversation support device;" Claim 33 claims "[a] system for invoking anchored conversations having artifacts of applications as a context;" Claim 36 claims "[a] method for initiating and coordinating anchored conversations;" Claim 42 claims "[a] method for managing anchored conversations;" and Claim 47 claims "A system for anchored conversations." Thus, each of the claims are distinct. Additionally, the limitations recited within Claims 33-47 are distinguishable from the limitations recited in Claims 1-27.

IV. Conclusion

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and a Notice of Allowance is requested. The

Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time to respond up to and including today, February 6, 2003.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: 2/06/03

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APPENDIX

In the Claims:

1. (Once Amended). A system for placing and maintaining anchored conversations within an artifact, comprising:

an application configured to access the artifact;

a conversation client configured to access said anchored conversation and to receive communications regarding a portion of the artifact;

an anchor configured to identify a location within said artifact with which said conversation client is associated; and

a conversation coordinator configured to [anchor at least one conversation client to one of an application and an artifact of said application] maintain a relationship between the anchor, the conversation client and the anchored conversation.

3. (Once Amended). The system according to claim 1, wherein said communications [made] received by said conversation client are persistent and accessible via said conversation coordinator.

4. (Once Amended). The system according to claim 1, further comprising:

a database configured to store conversations [engaged in] received by said conversation client;

wherein said conversation coordinator is further configured to allow a user access to any current or previous conversations stored in said database.

28. (Once Amended). An anchored conversation support device, comprising:

a placement mechanism configured to place an anchor at a selected position [with] within an artifact of an application; and

an action device configured to recognize actions taken by a user with respect to the anchor and activate routines configured to implement the actions taken.